

the defendant The City of New York was and is a domestic corporation lawfully organized and existing under the laws of the State of New York, and on said date and at all times relevant herein, said defendant had and has a principal place of business located at 530 Municipal Building, New York, New York 10007.

3. On or about April 23 2016,, and at all times relevant herein, on information and belief, previously designated defendants “John Doe” and “Richard Roe”, are NYPD police officers, defendant Police Officer Darnell Jones, and defendant Detective Frankie Soler respectively, and each act of wrongdoing herein after alleged to have been committed by these defendants was committed within the scope of their agency and/or authority and/or employment under a municipality implemented policy, statement, ordinance, regulation and/or decision officially adopted by that body’s officers, resulting in the herein after stated constitutional violations, on behalf of defendant The City of New York, which expressly and/or impliedly ratified each said act of wrongdoing, and at all times relevant herein, defendant Jones, Shield #4160, NYPD, had a place of business located at 120 West 82<sup>nd</sup> Street, NY, NY 10024, and defendant Soler, Shield #27130, NYPD, had a place of business located at 41<sup>st</sup> Precinct, 1035 Longwood Avenue, Bronx, NY 10459, and at all times relevant herein, pertaining to the arrest and/or prosecution of plaintiff, these defendants pursuant to a municipality implemented plan, custom, rule and/or decision, wrongfully fabricated inculpatory evidence and/or suppressed exculpatory evidence pertaining to plaintiff herein on or about April 23, 2016, and thereafter.

4. The names of defendants Police Officer Darnell Jones and Detective Frankie Soler, set forth in the initial Efiled April 19, 2019 complaint designating them as defendants “John Doe” and “Richard Roe” relate back to the initial timely filed complaint and at all times herein, plaintiff